

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	:	
Plaintiff,	:	No. 11-cv-9202 (PAC)
-v.-	:	ECF Case
DANIEL H. MUDD, ENRICO DALLAVECCHIA, and THOMAS A. LUND,	:	<u>ORAL ARGUMENT REQUESTED</u>
Defendants.	:	

NOTICE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Daniel H. Mudd, Enrico Dallavecchia, and Thomas A. Lund (together, "Defendants") move this Court, before the Honorable Paul A. Crotty, to grant summary judgment in their favor, for reasons more fully explained in the accompanying memorandum in support.

WHEREFORE, Defendants pray that this Court dismiss the Complaint in its entirety, with prejudice, grant Defendants summary judgment on all counts, and grant such other and further relief as the Court may consider appropriate.

Date: March 20, 2015

Respectfully submitted,

/s/ John W. Keker
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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2015, a true and correct copy of the foregoing was served electronically via the Court's Electronic Case Filing system on counsel for all parties.

/s/ John W. Keker

John W. Keker